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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

Jun 02, 2020

SEAN F. MCAVOY, CLERK

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAZZLYNN JOHNSON,  
BRYON TELLIER, and  
STEPHEN JOHNSON

Defendants.

2:20-CR-53-WFN

INDICTMENT

Vio: 18 U.S.C. §§ 471, 2  
Manufacture Counterfeit  
Obligations and Securities of  
United States  
(Count 1)

18 U.S.C. §§ 472, 2  
Uttering Counterfeit  
Obligations and Securities of  
United States  
(Count 2)

Forfeiture Allegations  
18 U.S.C. § 982(a)(2)(B),  
18 U.S.C. § 492, and  
28 U.S.C. § 2461(c)

The Grand Jury charges:

COUNT 1

Beginning on a date unknown, but by on or about March 29, 2020, and  
continuing until on or about April 7, 2020, in the Eastern District of Washington,  
the Defendants, JAZZLYNN JOHNSON, BRYON TELLIER, and STEPHEN

INDICTMENT – 1

JOHNSON, with the intent to defraud, did falsely make, forge, and counterfeit \$100 denomination Federal Reserve Notes, bearing serial numbers: EC90304318C, GS19710326Y, GS21739318Y, GS81739878Y, IL71282013Y, GS21739312Y, EC20104346C, IL70182067Y, EC9930444311C, GS77710029Y, IL08882013Y, GS51710011Y, GS51710016Y, and RD38359900M; in violation of 18 U.S.C. §§ 471, 2.

COUNT 2

On or about April 7, 2020, in the Eastern District of Washington, the Defendants, JAZZLYNN JOHNSON and BRYON TELLIER, with the intent to defraud, did pass and utter to an employee of Rite-Aid, 12222 E. Sprague, Spokane Valley, Washington, a falsely made, forged and counterfeited \$100 Federal Reserve Note bearing serial number: IL0328205Y, which each of the Defendants then knew to be falsely made, forged and counterfeited, in violation of 18 U.S.C. §§ 472, 2.

## NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 18 U.S.C. § 982(a)(2)(B), upon conviction of an offense in violation of 18 U.S.C. §§ 471, 472, and 2, as set forth in Count 1 and Count 2 of the Indictment, the Defendants, JAZZLYNN JOHNSON, BRYON TELLIER, and STEPHEN JOHNSON, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation.

If any of the property described above, as a result of any act or omission of the Defendants:

- a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third party;

- 1           c. has been placed beyond the jurisdiction of the Court;  
2           d. has been substantially diminished in value; or  
3           e. has been commingled with other property which cannot be divided  
4           without difficulty,

5           the United States of America shall be entitled to forfeiture of substitute property  
6           pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1).

7           Pursuant to 18 U.S.C. § 492 and 28 U.S.C. § 2461(c) upon conviction of an  
8           offense in violation of 18 U.S.C. §§ 471, 472, and 2, as set forth in Count 1 and  
9           Count 2 of the Indictment, the Defendants, JAZZLYNN JOHNSON, BRYON  
10          TELLIER, and STEPHEN JOHNSON, shall forfeit to the United States of  
11          America all counterfeits of any coins or obligations or other securities of the  
12          United States or of any foreign government; any articles, devices, and other things  
13          made, possessed, or used in violation of 18 U.S.C. §§ 471, 472; and, any material  
14          or apparatus used or fitted, or intended to be used, in the making of such  
15          counterfeits, articles, devices, or things, found in the possession of the Defendants  
16          without proper authority. The property to be forfeited, includes but is not limited  
17          to, the following listed assets:

- 19           a. HP Office Jet 4650 Printer, S/N TH75KD2G9, no power cable;  
20           b. Black ZTE cellphone with smashed screen, no power cable;  
21           c. Blue BNY 16 GB Thumbdrive;  
22           d. Black Cruzer 8 GB Thumbdrive;  
23           e. Black HP Office Jet 200 Mobile Printer, S/N HQ-TRE 71025;  
24           f. Black metal credit card punch machine with red handle; and,  
25           g. Silver Central Machinery Ultrasonic Cleaner machine, serial  
26           number 374051847.

27           If any of the property described above, as a result of any act or omission of  
28           the Defendants:

- a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third party;
  - c. has been placed beyond the jurisdiction of the Court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c). All pursuant to 18 U.S.C. § 492 and 28 U.S.C. § 2461(c).

DATED this 2 day of June, 2020.

A TRUE BILL

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**Foreperson**

William D. Hyslop  
United States Attorney

Patrick J. Cashman  
Assistant United States Attorney